

Greenberg Traurig, LLP  
10845 Griffith Peak Drive, Suite 600, Las Vegas, NV 89135  
(702) 792-3773 (702) 792-9002 (fax)

KARA B. HENDRICKS, Bar No. 07743  
hendricksk@gtlaw.com  
KYLE A. EWING, Bar No. 014051  
ewingk@gtlaw.com  
CHRISTIAN SPAULDING, Bar No. 14277  
cspaulding@gtlaw.com  
**GREENBERG TRAURIG, LLP**  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002

*Attorneys for Geoff Winkler Receiver*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY *et al.*

Defendants;

THE JUDD IRREVOCABLE TRUST *et al.*

Relief Defendants.

Case No. 2:22-CV-00612-CDS-EJY

**FIFTH QUARTERLY APPLICATION  
FOR PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES OF  
RECEIVER, RECEIVER’S COUNSEL  
GREENBERG TRAURIG, LLP, AND  
RECEIVER’S LITIGATION SUPPORT  
CONSULTANT AITHERAS, LLC FOR  
THE PERIOD APRIL 1, 2023  
THROUGH JUNE 30, 2023**

Comes now, Geoff Winkler, the Court-appointed Receiver (the “Receiver”), by and through his counsel of record the law firm of Greenberg Traurig, LLP, and hereby submits this Fifth Quarterly Application for Payment of Fees and Reimbursement of Expense of Receivers, Receiver’s counsel Greenberg Traurig, LLP, and Receiver’s Litigation Support Consultant Aitheras, LLC for the period of April 1, 2023 through June 30, 2023 (“Fifth Application”).<sup>1</sup>

///

///

<sup>1</sup> A separate application will be submitted by the law firms of Allen Matkins Leck Gamble Mallory & Natsis LLP and Semenza Kircher Rickard.

1 This Application is based on the below Memorandum of Points and Authorities, the  
 2 declarations attached hereto, the pleadings and papers on file herein, and such other and further  
 3 information as may be presented to the Court at the time of any hearing.

4 DATED this 15<sup>th</sup> day of August 2023.

5 **GREENBERG TRAURIG, LLP**

6 /s/ Kara B. Hendricks

7 KARA B. HENDRICKS, Bar No. 07743

8 JASON K. HICKS, Bar No. 13149

9 KYLE A. EWING, Bar No. 014051

10 10845 Griffith Peak Drive, Suite 600

11 Las Vegas, Nevada 89135

12 *Attorneys for Receiver Geoff Winkler*

13 **MEMORANDUM OF POINTS AND AUTHORITIES**

14 **I. INTRODUCTION.**

15 As the Court is aware, Geoff Winkler of American Fiduciary Service (“AFS”) was  
 16 appointed as Receiver in this matter on June 3, 2022 (ECF No. 88). Because the Receiver is not  
 17 a licensed attorney, does not have in-house counsel, and due to the scope of service needed during  
 18 the Application Period he employed professionals to assist him in fulfilling his duties as the  
 19 Receiver. Greenberg Traurig is one of three firms that serve as Court-approved counsel to the  
 20 Receiver, and whose appointment was reaffirmed via the Court’s July 28, 2022 Order Amending  
 21 Receivership Order (ECF No. 88) (the “Amended Appointment Order”) (ECF No. 207).  
 22 Additionally, Aitheras, LLC (“Aitheras”) serves as the Receiver’s litigation support consultant,  
 23 whose employment was approved by this Court on February 17, 2023. ECF No. 470.

24 Pursuant to the terms of the Appointment Order and Amended Appointment Order, the  
 25 Receiver is vested with authority and control over J&J Consulting Services, Inc., an Alaska  
 26 corporation; J&J Consulting Services, Inc., a Nevada corporation; J and J Purchasing LLC; The  
 27 Judd Irrevocable Trust; and BJ Holdings LLC, and over the Wells Fargo Interest on Lawyers’  
 28 Trust Account ending in 5598 and held in the name of Beasley Law Group PC, along with the  
 personal assets of certain individual defendants in the above-entitled action (all, collectively, the

“Receivership Defendants”) and authorized to, subject to the approval of this Court, “engage and employ persons in his discretion ... to assist him in carrying out his duties and responsibilities [as Receiver], including, but not limited to ... attorneys” and other professionals. (*See* Appointment Order at ¶ 7(F)).

This Application represents the fifth quarterly application for payment of fees and reimbursement of expenses of the Receiver and Greenberg Traurig in accordance with Paragraph 62 of the Appointment Order, and covers fees and expenses incurred between April 1, 2023 through June 30, 2023 (the “Application Period”).

By way of this Application, the Receiver and Greenberg Traurig request the Court’s approval of 100% of their fees and expenses incurred during the Application Period and further requests the interim payment of 80% of such fees and 100% of such expenses, to be paid from the funds of the receivership estate established in the above-entitled action (the “Receivership Estate” or “Estate”). Specifically, the amounts of the Applicants’ fees and expenses sought to be approved and paid under this Fee Application are as follows:

APPLICANT	TOTAL FEES	INTERIM PAYMENT REQUESTED (FEES)	EXPENSES	INTERIM PAYMENT REQUESTED (EXPENSES)
Receiver/AFS	\$508,255.00	\$406,604.00	\$9,771.96	\$9,771.96
Greenberg Traurig	\$128,000.91	\$102,400.72	\$1,733.16	\$1733.16
Aitheras	\$660.00	\$660.00	\$0	\$0
<b><u>TOTAL</u></b>	<b>\$636,915.91</b>	<b>\$509,664.72</b>	<b>\$11,505.12</b>	<b>\$11,505.12</b>

AFS’s rates include a discount of its already discounted hourly rates for government matters and will not increase for the pendency of the case. Both the standard regulatory rate and the discounted regulatory rate reflect a significant discount of their standard consulting rates. Greenberg Traurig agreed to discount its standard billing rates for this matter by fifteen percent (15%) which represents a savings of more than \$30,000.00 to the receivership estate. Additionally, Greenberg Traurig voluntarily wrote off certain time including the time associated with preparation of requisite fee applications and is not seeking compensation for the same.

1 Similarly, the rates charged by Aitheras comport with the fees set forth, and approved by this  
2 Court, in the Receiver's Motion to Employ Litigation Support Consultant. *See* ECF No. 455.

3 All billing standards meet or exceed the SEC's Billing Instructions for Receivers in Civil  
4 Actions Commenced by the U.S. Securities and Exchange Commission (SFAR) and the U.S.  
5 Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of  
6 Expenses.

7 Consistent with the billing guidelines of the plaintiff Securities and Exchange  
8 Commission (the "SEC") the Receivers seeks payment of 80% of the fees set forth herein with  
9 the remaining, unpaid 20% "holdback" of approved fees being subject to final review and  
10 payment at the conclusion of this receivership. SEC staff has reviewed and provided comments  
11 on the fee statements and does not oppose the interim approval and payment of the fees and costs  
12 sought.<sup>2</sup>

## 13 **II. SUMMARY OF WORK IN APPLICATION PERIOD**

14 During the Application Period, and with assistance of counsel including Greenberg  
15 Traurig, the Receiver and the AFS team made substantial progress on critical elements of Estate  
16 administration, including: continued discussions with certain Defendants, their respective  
17 counsel, and third parties believed to be in possession of Receivership Entity assets or records, to  
18 arrange for the turnover of same; securing and reviewing critical documentation relating to the  
19 business and financial activities of the Receivership Entities (including bank statements and other  
20 financial documents); working with special litigation counsel to assemble evidence in support of  
21 the Receiver's claims; communications with investors, and other information pertinent to the  
22 Receiver's duties; continuing the process of liquidating assets; evaluating and assessing certain  
23 Defendant's business assets; communicate with counsel for the SEC; evaluating third party  
24 recovery potential; and preparation and filing of matters with the Court for the benefit of the  
25 Receivership Estate.<sup>3</sup> The Receiver's highly successful efforts have resulted in the recovery of  
26

---

27 <sup>2</sup> All comments made by the SEC were incorporated into the invoices submitted for the Court's review  
28 including writing off entries where questions were raised by the SEC regarding the same.

<sup>3</sup> The Receiver's efforts were bolstered by the services provided by Aitheras including, but not limited to  
the development of data storage and forensic data collection.

1 assets, including cash, cryptocurrency, personal property, real properties and other with an  
2 estimated gross value of more than \$174 million.

3 As is common in the early stages of a complex receivership involving hundreds of millions  
4 of dollars in assets – here, the Receiver and his professionals were required to expend significant  
5 time and effort to preserve the *status quo*, pursue the recovery of receivership assets, and  
6 undertake efforts to obtain financial documents and other information that will likely prove  
7 critical to the administration of the Estate, the Receiver’s evaluation of prospective creditor  
8 claims, and any clawback or disgorgement litigation that the Receiver ultimately determines, in  
9 his reasonable business judgment, is required to recover assets for the benefit of the Estate and its  
10 creditors.

11 Given the amount and significance of the work completed by AFS and Greenberg Traurig  
12 and the significant benefit of their efforts to the Estate, the Receiver and Greenberg Traurig  
13 respectfully submit—as further detailed in the accompanying Motion to Approve Fee  
14 Applications (filed under separate cover)—that the fees and expenses incurred during the  
15 Application Period are reasonable and appropriate and should be approved and paid, on an interim  
16 basis, in the amounts indicated above. Again, as an accommodation to the Estate, and consistent  
17 with the SEC’s billing guidelines and the ordinary practice in federal receiverships, AFS and  
18 Greenberg Traurig request that the Court approve 100% of the fees and expenses incurred during  
19 the Application Period but authorize payment, on an interim basis, of only 80% of such fees and  
20 100% of such expenses, at this time.

21 **A. Receiver’s Fees and Services.**

22 Pursuant to Appointment Order, the Receiver was empowered and tasked with a broad  
23 range of authority, including the authority to take possession and control of all assets, to assume  
24 full control of the J&J Receivership Defendants, to have control of and be added as the sole  
25 authorized signatory for all accounts, to conduct an investigation and discovery necessary to  
26 locate and account for assets, to assess the viability and profitability of the J&J Receivership  
27 Defendants, to take action necessary to preserve and prevent the disposition, concealment, or  
28 dissipation of assets, to employ professionals, to make an accounting, to make payments and

disbursements, to investigate and prosecute claims, to engage in litigation to preserve or recover assets or to carry out the Receiver's mandate, and to have access to all mail and electronic mail.

Due to its broad range of experience and expertise, the Receiver by and through AFS performs almost all required work in-house, saving both time and money, including tasks involving corporate accounting, forensic accounting, case administration, claims administration, asset valuation, investor communication and internet technology. AFS' billing philosophy is to leverage work down to the staff member with the lowest bill rate that also has the skills and experience necessary to complete the task. This allows AFS to minimize the cost to complete all work associated with the case, ensuring a maximum return to stakeholders involved in the matter while also preserving the quality of their work product. AFS does not bill for travel time in regulatory cases.

The Receiver's fees for the Application Period are as follows:

NAME	TITLE	HOURS	RATE/HR.	TOTAL
Geoff Winkler	Receiver	242.5	\$340.00	\$82,450.00
John Hall	Accountant	246.8	\$310.00	\$76,508.00
Milana Barkhanoy	Director of Case Management	316.8	\$280.00	\$88,704.00
Josh McGraw	Case Manager	154.1	\$255.00	\$39,295.50
Amanda Deering	Case Manager	75.1	\$240.00	\$18,024.00
Grace Radke	Case Manager	268.4	\$235.00	\$63,074.00
Anna Priebe	Associate Business Consultant	187.0	\$230.00	\$43,010.00
Maggie Chavez	Associate Business Consultant	113.1	\$225.00	\$25,447.50
Phil Chen	Associate Business Consultant	73.2	\$225.00	\$16,470.00
Khyati Desai	Associate Business Consultant	68.8	\$215.00	\$14,792.00
Orest Revych	Associate Business Consultant	202.4	\$200.00	\$40,480.00
<b>TOTAL</b>		<b>1,948.2</b>		<b>\$508,255.00</b>

///

AFS's rates include a discount off its already discounted hourly rates for government matters and will not increase for the pendency of the case. Both the standard regulatory rate and the discounted regulatory rate reflect a significant discount off their standard consulting rates. All billing standards meet or exceed the SEC's Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (SFAR) and the U.S. Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses.

The Receiver's expenses for the Application Period are as follows:

CATEGORY	TOTAL COST
Airfare	\$3,611.51
Courier/Shipping/Freight	\$107.57
Automotive	\$1,022.82
Hotel	\$2,998.88
Meals	\$966.00
Internet/Online Fees	\$135.64
Miscellaneous	\$709.04
Document and Asset Storage	\$220.50
<b>TOTAL</b>	<b>\$9,771.96</b>

AFS does not seek reimbursement for routine copying, facsimile, postage, or other expenses. Any expenses which AFS seeks to have reimbursed are done so in accordance with the SEC and U.S. Trustee guidelines above. Costs directly attributable to the administration of the estate will be paid directly by the estate in accordance with the order of appointment.

The Standardized Fund Accounting Report, AFS's invoices, and its billing entries are included with the Declaration of Geoff Winkler attached as **Exhibit 1**.

#### **B. Greenberg Traurig's Fees and Services.**

Greenberg Traurig was retained by the Receiver in June 2022. The Receiver selected Greenberg Traurig as one of two firms serving as general receivership counsel due to the firm's

litigation experience, receivership experience, familiarity with local rules and procedures and strong Nevada base. As Nevada counsel, Greenberg Traurig has taken the lead on working with counsel for the numerous defendants in this matter, evaluating and assisting with asset turnover efforts, and the filing stipulations and motions on behalf of the Receiver to further Receivership Estate needs. During the Application Period, Greenberg Traurig extensively assisted the Receiver in the performance of his duties under the Appointment Order, including communicating with counsel for the Defendants to facilitate the turnover of records and receivership assets, preparing various motions related to the recovery or Receivership Assets including motions to compel concerning funds held by counsel for defendants and for the turnover of certain vehicles, assisting with real estate matters, working with professionals approved by the Court to facilitate the sale of real property and vehicles, helping facilitate and participation in investor meetings, preparing subpoenas and following up with third parties regarding items identified as potential receivership property, communicating with the SEC and U.S. Attorney's office regarding matters affecting the Receivership Estate, analyzing documents and information provided relating to potential sale of business related items invested in and/or owned by Defendants, and researching legal issues that impact the Receivership Estate as identified and directed by the Receiver.

In all, on account of its services rendered to the Receiver during the Application Period, Greenberg Traurig has billed 370.40 hours, and incurred \$128,000.91 in fees and \$1,733.16 in expenses, across the following categories:

CATEGORY	HOURS	FEES	EXPENSES
Asset Analysis and Recovery	329.80	\$118,569.39	\$1,733.16
Business Operations	1.50	\$262.50	0
Case Administration	35.20	\$7,467.31	0
Claims Administration & Objections	.80	\$384.21	0
Litigation Consulting	3.10	\$1,317.50	0
<b>TOTAL</b>	<b>370.40</b>	<b>\$128,000.91</b>	<b>\$1,733.16</b>

///

Provided below are narrative summaries of the work performed under each of the categories. Additionally, Greenberg Traurig's invoices are included with the Declaration of Kara Hendricks attached as **Exhibit 2**. Greenberg Traurig consistently endeavored to staff each task efficiently, using a core team of attorneys, with specialized assistance as necessary.

Greenberg Traurig's fees for the Application Period for the category of "Asset Analysis and Recovery" are as follows:

NAME	TITLE	HOURS	RATE/HR.	TOTAL
Kara B. Hendricks	Shareholder	105.80	\$480.25	\$50,810.38
Beth Bigler	Shareholder	.30	\$408.00	\$122.40
Jodi Goodheart	Shareholder	1.20	\$833.00	\$999.60
Kyle Ewing	Sr. Associate	72.80	\$340.00	\$24,752.00
Christian Spaulding	Associate	90.00	\$318.75	\$28,687.51
Rowena Santos	Associate	2.0	\$425.00	\$850.00
Whitney Welch-Kirmse	Of Counsel	9.0	\$425.00	\$3,825.00
Amy Hershberger	Paralegal	.40	\$175.00	\$70.00
Steph Morrill	Paralegal	47.0	\$175.00	\$8,225.00
Cynthia Ney	Paralegal	1.30	\$175.00	\$227.50
<b>TOTAL</b>		<b>329.80</b>		<b>\$118,569.39</b>

Work performed in this category related primarily to the Receiver's efforts to communicating with counsel for the Defendants to facilitate the turnover of records and receivership assets, preparing motions when necessary to compel the turnover of Receivership Property, working with professionals approved by the Court to facilitate the sale of real property and vehicles and preparing subpoenas and following up with third parties regarding items identified as potential receivership property.<sup>4</sup>

///

<sup>4</sup> During the Application Period, counsel for the Receiver consulted on real estate matters with Jodi Goodheart and Whitney Welch-Kirmse who has expertise in this area. The rates of the real estate attorneys were reduced by a 15% discount.

Greenberg Traurig also handled certain business operation related activities including preparing and filing the 2023 annual report for J&J Consulting with the Nevada Secretary of State. Greenberg Traurig's fees for the Application Period for the category of "Business Operations" are as follows:

NAME	TITLE	HOURS	RATE/HR.	TOTAL
Jennifer Rohrbach	Paralegal	1.50	\$175.00	\$262.50
<b>TOTAL</b>		<b>1.50</b>		<b>\$262.50</b>

Greenberg Traurig also handled a number of case administration activities including the review of numerous filings and coordinating efforts to respond and follow-up to ensure the organization and efficiency of the Receivership team as a whole. Additionally, Greenberg Traurig communicated with the SEC and U.S. Attorney's office regarding matters affecting the Receivership Estate and prepared motions to assist the Receiver. Greenberg Traurig's fees for the Application Period for the category of "Case Administration" are as follows:

NAME	TITLE	HOURS	RATE/HR.	TOTAL
Kara B. Hendricks	Shareholder	4.0	\$480.25	\$1,921.06
Christian Spaulding	Associate	.60	\$318.75	\$191.25
Steph Morrill	Paralegal	2.50	\$175.00	\$437.50
Suzanne Williams	Paralegal	28.10	\$175.00	\$4,917.50
<b>TOTAL</b>		<b>35.20</b>		<b>\$7,467.31</b>

Greenberg Traurig also worked with various parties, including counsel for Defendants to develop and facilitate the impending claims process and funds and assets related thereto. Greenberg Traurig also acted as a liaison when approached by counsel for investors or claimants with questions regarding the receivership referring as appropriate inquiries directly to the Receiver's office. As a result of the same, Greenberg Traurig's fees for the Application Period for the category of "Claims Administration & Objections" are as follows:

///

NAME	TITLE	HOURS	RATE/HR.	TOTAL
Kara B. Hendricks	Shareholder	0.80	\$480.25	\$384.21
<b>TOTAL</b>		<b>0.80</b>		<b>\$384.21</b>

Greenberg Traurig also consulted on litigation-related activities including the evaluation of objections received in response to third party subpoenas and the analysis and development of efforts to further the discovery of relevant documents and information. Greenberg Traurig's fees for the Application Period for the category of "Litigation Consulting" are as follows:

NAME	TITLE	HOURS	RATE/HR.	TOTAL
Rowena Santos	Associate	3.10	\$425.00	\$1,317.50
<b>TOTAL</b>		<b>3.10</b>		<b>\$1,317.50</b>

As referenced above, Greenberg Traurig endeavored to staff each task efficiently, using a core team of attorneys and utilizing associates and paralegal assistance where appropriate. Additionally, Greenberg Traurig agreed to discount its standard billing rates for this matter by 15% and with the discounted rates identified above.

### **C. Aitheras, LLC's Fees and Services**

As noted herein, the Receiver's employment of Aitheras was approved by this Court on February 17, 2023. ECF No. 470. As reflected in the attached invoice, Aitheras' services during the Application period consisted only of the monthly fees for Secure Cloud Document Storage for the months of April, May, and June 2023. *See* ECF No. 455 at p. 9, ECF No. 470. In total, Aitheras incurred \$660.00 in fees during the Application Period.<sup>5</sup> Aitheras' invoice for the Application Period is included with the declaration of Joseph Friend, attached as **Exhibit 3**.

### **D. The Requested Fees and Services are Reasonable and Should be Approved.**

The Receiver and Greenberg Traurig respectfully submit that the fees and expenses incurred during the Application Period were fair, reasonable, necessary, and significantly benefited the Estate. Specifically, and as reflected in **Exhibits 1, 2, and 3** AFS, Greenberg

<sup>5</sup> Based on the services provided by Aitheras and the employment order previously approved by the Court, the Receiver intends to pay Aitheras the full amount requested, without any hold back.

1 Traurig, and Aitheras have endeavored to staff this matter appropriately, billing their time at  
2 substantially discounted rates, and steadfastly attempted to avoid duplication of effort by, among  
3 other things, coordinating with the Receiver and co-counsel regarding a formal division of labor  
4 and participating in regular discussions regarding work in progress to minimize the likelihood of  
5 duplication. In addition, and as reflected in the Receiver's prior submissions to this Court, AFS  
6 and Greenberg Traurig are providing an extremely high quality of work in a matter involving  
7 dozens of relevant parties and hundreds of millions of dollars in assets. Their efforts are bearing  
8 fruit as assets, including cash, cryptocurrency, personal property, real properties and other with  
9 an estimated gross value of more than \$174 million have been recovered to date. Put simply, in  
10 a highly complex receivership, and while the Receiver continues to develop a comprehensive  
11 knowledge and understanding the underlying facts, critical players, and assets, the Receiver—  
12 with the help of Greenberg Traurig—is recovering millions of dollars in cash, obtaining the  
13 turnover of millions of dollars in personal and real property, and has already secured Court  
14 approval of procedures aimed at monetizing those assets in a manner intended to maximize the  
15 recovery for the benefit of the Estate and its investors and creditors.

16 The fees and expenses incurred by AFS and Greenberg Traurig are nominal when  
17 compared to these results, and it is respectfully requested that that the Court approve 100% of  
18 their fees and expenses, and also authorize the payment of those fees and expenses on a  
19 percentage, interim basis, as requested herein.

20 AFS and Greenberg Traurig's invoices were submitted to the SEC for review prior to the  
21 filing of this Application and comments and concerns addressed prior to this submittal. As of the  
22 date of the filing of this Application, the SEC has not indicated that it has outstanding substantive  
23 questions regarding the fees requested. Nor has the SEC indicate it will oppose, the Application.

### 24 **III. CONCLUSION.**

25 For the foregoing reasons, the Receiver and Greenberg Traurig respectfully requests that  
26 the Court enter an order:

- 27 1. Granting this Application in its entirety;

28 ///

Greenberg Traurig, LLP  
10845 Griffith Peak Drive, Suite 600, Las Vegas, NV 89135  
(702) 792-3773 (702) 792-9002 (fax)

2. Approving the Receivers' fees and expenses incurred during the Application Period, in the respective amounts of \$508,255.00 and \$9,771.96;

3. Authorizing the Receiver to pay AFS on an interim basis, 80% of its approved fees incurred during the Application Period, in the amount of \$406,604.00, and 100% of its approved expenses incurred during the Application Period, in the amount of \$9,771.96, from the funds of the Receivership Estate;

4. Approving Greenberg Traurig's fees and expenses incurred during the Application Period, in the respective amounts of \$128,000.91 and \$1,733.16;

5. Authorizing the Receiver to pay Greenberg Traurig on an interim basis, 80% of its approved fees incurred during the Application Period, in the amount of \$102,400.72; and 100% of its approved expenses incurred during the Application Period, in the amount of \$1,733.16, from the funds of the Receivership Estate;

6. Approving Aitheras' fees incurred during the Application Period in the amount of \$660.00 and authorizing the Receiver to pay 100% of the same;

7. Providing such other and further relief as the Court deems just and proper under the circumstances.

DATED this 15<sup>th</sup> day of August 2023.

**GREENBERG TRAURIG, LLP**

*/s/ Kara B. Hendricks*

KARA B. HENDRICKS, Bar No. 07743

KYLE A. EWING, Bar No. 014051

CHRISTIAN SPAULDING, Bar No. 14277

10845 Griffith Peak Drive, Suite 600

Las Vegas, Nevada 89135

*Attorneys for Receiver Geoff Winkler*

**CERTIFICATE OF SERVICE**

I hereby certify that, on the **15<sup>th</sup> day of August 2023**, a true and correct copy of the foregoing **FIFTH QUARTERLY APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER, RECEIVER'S COUNSEL GREENBERG TRAUIG, LLP, AND RECEIVER'S LITIGATION SUPPORT CONSULTANT AITHERAS, LLC FOR THE PERIOD APRIL 1, 2023 THROUGH JUNE 30, 2023** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF system, and parties may access this filing through the Court's CM./ECF system.

/s/ Evelyn Escobar-Gaddi

An employee of GREENBERG TRAUIG, LLP

## LIST OF EXHIBITS

EXHIBIT	DESCRIPTION	
<b>Exhibit 1</b>	<b>DECLARATION OF GEOFF WINKLER</b>	
	Exhibit A	Standardized Fund Accounting Report
<b>Exhibit 2</b>	<b>DECLARATION OF KARA B. HENDRICKS</b>	
	Exhibit A	Greenberg Traurig Invoices
<b>Exhibit 3</b>	<b>DECLARATION OF JOSEPH FRIEND</b>	
	Exhibit A	Aitheras Invoice